

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**PLAINTIFF'S MOTION TO RECONSIDER ORDER NO. 316 GRANTING  
DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT IN PART**

Plaintiff Johnny M. Hunt, by and through the undersigned counsel, submits this Motion to Reconsider Order No. 316 Granting Defendants' Motions for Summary Judgment in Part.

Plaintiff respectfully requests that the Court to reconsider Order No. 316 granting Defendants' motions for summary judgment in part. As explained in the accompanying Memorandum, the consensual extramarital encounter between Pastor Johnny and Jane Doe was a private matter and Guidepost's self-interested reporting cannot transform it into a matter of public concern. Pastor Johnny introduced evidence upon which a jury could find each Defendant liable under the negligence standard or the actual malice standard. Reconsideration is necessary to correct clear errors of law and to prevent manifest injustice.

For the foregoing reasons, as well as the reasons set forth in the accompanying Memorandum, this Court should grant this Motion.

Dated: April 17, 2025

Respectfully submitted,

s/ Andrew Goldstein

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## **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Motion to Reconsider Order No. 316 Granting Defendants' Motions for Summary Judgment in Part to be electronically filed with the Clerk of the Court on April 17, 2025, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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